

From: Marnee Foldo [REDACTED]
Sent: Monday, July 09, 2012 4:10 PM
To: Wessel, Ann (ECY)
Subject: Proposed Dungeness Water Rule

To Ann Wessel and other Department of Ecology members responsible for the proposed Dungeness Water Rule:

I have attended several meetings over the past few years regarding WRIA 18 and the proposed water rule for the Dungeness Watershed. Although I am not a scientist, I am educated (undergraduate minor in Botany; Masters degree; and several teaching credentials from California and Washington). My husband and I have lived in Sequim for 9 years, having moved here from northern California.

This rule should not be adopted or put into force. As you are aware from the public meetings, there is overwhelming opposition to the rule as written. If it were indeed a good rule with clear benefits, and with benefits that clearly outweighed the costs, I believe there would be public support.

I am writing to voice my opposition to the proposed Water Rule for the Dungeness Watershed, WRIA 18. My opposition covers several aspects of this rule, including, but not limited to the following:

1. First and foremost is a glaring omission in the Cost Benefit Analysis. In the section on the costs of the rule, you neglected to mention any impact on property values. Once access to water is limited, the value of the property will decrease. Consequently, there will be a decrease in property taxes. Once this source of revenue declines, the State, as well as Clallam County, will either increase taxes, which will cause a burden on the taxpayer (and a further burden on those who have had their property devalued), or services will be cut and/or eliminated. This will cause a burden to the residents who access the services, as well as the employees who will have their work hours reduced or their jobs eliminated. The ramifications of this go on and on, and the financial cost will be huge. There will be a negative impact on price when owners want to sell their property. The cost of the potential decrease in property values needs to be accounted for and added to the cost benefit analysis.

2. Washington is the "Evergreen State." It is evergreen due to the abundance of rain. I have doubts about the necessity of restricting water usage. Although I have concerns about population growth (in California, I saw that it can destroy an area), I do not think this rule is appropriate. Metering water usage is a bad idea; it will only be a matter of time before an agency will start charging for water usage. The cost of drilling a well is significant. To have to pay for the water you draw out of the expensive well that you must drill is unfair and burdensome. The cost of paying for water from a well was not figured in the cost benefit analysis.

3. This rule discourages landscaping and gardening. Landscaping adds value to property. Trees can provide protection from wind, insulate from heat and cold, and mitigate the need (and cost) for heating and cooling. The cost of food keeps increasing, while the taste of produce keeps diminishing due to the depletion of minerals in soil. People should be encouraged, not

discouraged, to grow their own food and landscape their property. There are financial and health benefits to both, and detriments to letting landscaping die or not providing landscaping.

4. The limitations of consumptive use for property with a public sewer system seems too restrictive. It does not take into account the number of people who live in the home. Although I support family planning, I do not think limiting water usage is the appropriate method. We have low flow toilets. Washing machines use less water. There are many ways to conserve water. I lived through water rationing, water conservation, bricks in the toilet tank, and "if it's yellow, let it mellow." Due to health issues and physical limitations, bathing as opposed to showering may be a necessity, even though the water usage is higher. One hundred fifty gallons per day may not be adequate. It is not moral or logical to limit water usage when hygiene may be impaired. The cost of poor hygiene on emotional as well as physical health could be considerable.

5. The realtors in Clallam County, at their own expense, mailed postcards to residents with information about the water rule. Dissemination of information, including full disclosure of the impact on each property owner, should be the responsibility of the Department of Ecology and the State of Washington. Thousands of property owners will be potentially affected by this rule. Some live out of the area. Information this important should be delivered directly to each property owner, and not just noticed in the media. There is a cost involved with the full disclosure of this information. If you do not have the funds to provide this information, then this rule should not be approved.

All of these points of opposition have related costs which were not addressed in the Cost Benefit Analysis. Before moving further, I think it is imperative that you address the costs I have mentioned, as well as others which exist, of which I am unaware. I think that if you do a more thorough cost benefit analysis, you will find that the costs exceed the benefits, and that the rule should not be approved or implemented as is.

I understand that a lot of time and money has been invested in this project. I appreciate the efforts you have taken to meet with the public and listen to the opposition to the rule. This proposed rule will cause more harm than good. Please include my comments and opposition to the proposed rule as part of the public record.

Sincerely,

Marnee Foldoe

